

Helena Agri-Enterprises, LLC

Privacy Policy

Last Revised: January 13, 2025

1. GENERAL

We know that your privacy is important to you, and we work hard to earn and keep your trust. Helena Agri-Enterprises, LLC and its Affiliates, defined below (collectively, “Company,” “we,” “us,” and “our”), respects your privacy and is committed to protecting your privacy through our compliance with this Privacy Policy (the “Policy”). “Affiliates” means any subsidiary or other entity that is directly or indirectly controlled by or under common control of Helena Agri-Enterprises, LLC. The words “you” and “your” refer to you as a user of the Platform (defined below), either as a visitor, registered customer, or employee of a Company customer.

This Policy describes:

- The types of information we collect from you or that you may provide when you:
 - Visit our websites available at: <https://www.helenaagri.com/>, <https://www.helenacareers.com/>, and any websites and blogs directly owned by, or operated by or on behalf of, the Company where this Policy is linked (the “Website”);
 - Use our mobile applications, including AI360®, and any other mobile applications directly owned by, or operated by or on behalf of, the Company and where this Policy is linked (the “Applications”);
 - Use our online payment systems (the “Online Payment Systems”); and
 - Provide us information offline, such as in person or at Company’s physical locations (collectively, with the Website, Applications and Online Payment Systems, the “Platform”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on the Platform or in emails and other electronic messages between you and the Platform, and information gathered when you interact with our advertising on third-party websites if such advertisements include links to this Policy.

This Policy does not apply to information collected on any other website operated by any third party, or information collected by any third party through any application or content (including advertising) that may link to or be accessible from the Platform (for further information, see below, “Third-party Websites”).

Please read this Policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use our Platform. By using our Platform, you agree to the terms of this Policy. This Policy may change from time to time (see below, “Changes to this Policy”). Your continued use of our Platform after

we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

2. CALIFORNIA PRIVACY DISCLOSURE; TERMS OF USE; OTHER AGREEMENTS

This Policy is incorporated by reference and should be read in conjunction with the Company's (1) [California Privacy Disclosure](#) and (2) [Terms of Use](#).

Additionally, this Policy is subject to the terms and conditions set forth in the Company's Offerings Enrollment Agreement and to any other agreement you have with the Company for specific products and services provided by the Company. In other words, in the event the terms of this Policy conflict with terms set forth in other agreements you have with the Company, the terms in the other agreements are controlling.

3. THE INFORMATION WE COLLECT

Personal Information. To ensure that we provide you with the best possible experience, we will store, use, and disclose personal information about you in accordance with this Policy. Personal information is information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular user, household or device ("Personal Information"). The Personal Information that we may receive and collect depends on what you do when you visit our Website, Applications, Online Payment Systems, or physical locations.

Raw Data. Raw Data is data generated or collected by your equipment and devices or by equipment and devices owned/operated by third parties. "Raw Data" includes land data, field boundaries, images, yield data, lab results, soil and tissue samples, agronomic data, information or data that you or your agents provide to us, and data generated by any devices used over, under or on the property upon which you operate; provided, however, Raw Data shall not include any information that is publicly available, or information capable of being obtained from a third party source without any obligation of confidentiality.

Aggregated and De-Identified Data. We may also collect, use and disclose Aggregated and De-Identified Data such as statistical or demographic data for any purpose. Aggregated and De-Identified Data could be derived from your Personal Information or Raw Data but is generally not considered Personal Information under applicable law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated or De-Identified Data with your Personal Information or Raw Data so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this Policy.

Free-Text Boxes. The information that you provide in each case will vary. In some cases, you may be able to provide Personal Information via email or free text boxes, such as contacting the Company to request further information. When providing your Personal Information, please provide only relevant information and do not provide unnecessary sensitive information, such as Social Security numbers, credit card information or other sensitive personal data, unless required for our services.

Username and Password; Other Sources. We may ask you to create a username and password that should only be known to you. When you provide this information to us, you are no longer anonymous. Additionally, we may receive information about you from other sources and add it to the information you have provided to us.

Credit Card Information. Please note that for any credit card information provided on the Platform, we utilize a trusted third-party PCI-DSS compliant payment processor to process all of your transactions and it collects and maintains the necessary Personal Information needed to necessitate such transactions.

Recording Use of the Website. We partner with trusted third-party vendors to analyze performance and traffic of our Platform. This may include things like buttons you click, mouse movements and other behavior on the Platform, date and time of access, pages visited, web beacons, and cookie or pixel tag information. Please see our Automatic Information Collection section below to learn more about cookies, pixels tags, and analytic technologies.

(a) Information We May Collect on the Website

You may have the opportunity to provide Personal Information on our Website, including but not limited to:

- *Personal identifiers:* first and last name; postal address; telephone number; email address.
- *Internet activity:* browsing history; search history; information in relation to our Website.
- *Financial information:* credit card or other payment information.
- *Professional or employment related information:* Current or past job history in relation to a resume.

We may obtain the Personal Information listed above from the following categories of sources:

- *Directly from you.* For example, when you:
 - subscribe to one of our e-newsletters;
 - submit a job application; or
 - otherwise communicate with us, such as contacting us for more information.
- *Indirectly from you.* For example, through information we collect from you in the course of providing our services to you.
- *Directly and indirectly from activity on our Platform.* For example, from Platform usage details that are collected automatically. For more information on automatic information collection, please review the “Automated Information Collection” section below.

(b) Information We May Collect on the Applications

You may have the opportunity to provide Personal Information on our Applications, including but not limited to:

- *Personal identifiers:* first and last name; postal address; telephone number; email address.

- *Commercial Information*: records of personal property (including Raw Data); products or services applied for or obtained; purchasing tendencies; soil analysis, mapping information.
- *Internet activity*: browsing history; search history; information in relation to our Applications.
- *Geolocation data*: IP address; device location; any information used to identify your precise location.

We may obtain the Personal Information listed above from the following categories of sources:

- *Directly from you*. For example, when you:
 - register yourself with the Applications;
 - upload documentation or reports to the Applications;
 - subscribe to one of our e-newsletters;
 - provide feedback or information regarding our services; or
 - otherwise communicate with us, such as contacting us for more information.
- *Indirectly from you*. For example, through information we collect from you in the course of providing our services to you, such as collecting Raw Data from your equipment and devices, including third party devices or devices purchased from Helena. The equipment and devices may include farm machinery, implements, cameras, and drones.
- *Directly and indirectly from activity on our Platform*. For example, from Applications usage details that are collected automatically. For more information on automatic information collection, please review the “Automated Information Collection” section below.

(c) Information We May Collect on the Online Payment Systems

You may have the opportunity to provide Personal Information on our Online Payment Systems, including but not limited to:

- *Personal identifiers*: Social Security number, first and last name; postal address; telephone number; email address.
- *Financial details*: bank account numbers; debit/credit card numbers; transaction details.
- *Commercial Information*: records of personal property (including Raw Data); products or services applied for or obtained; purchasing tendencies; your company or organization name; your job title.
- *Internet activity*: browsing history; search history; information in relation to our Online Payment Systems.
- *Geolocation data*: IP address; device location; any information used to identify your precise location.

We may obtain the Personal Information listed above from the following categories of sources:

- *Directly from you*. For example, when you:
 - register yourself with the Online Payment Systems;

- subscribe to one of our e-newsletters;
- complete a transaction for our services, such as purchasing a product;
- submit a credit application;
- provide feedback or information regarding our services; or
- otherwise communicate with us, such as contacting us for more information.
- *Indirectly from you.* For example, through information we collect from you in the course of providing our services to you, such as collecting Raw Data from your equipment and devices, including third party devices or devices purchased from Helena. The equipment and devices may include farm machinery, implements, cameras, and drones.
- *Directly and indirectly from activity on our Platform.* For example, from Online Payment Systems usage details that are collected automatically. For more information on automatic information collection, please review the “Automated Information Collection” section below.

4. AUTOMATED INFORMATION COLLECTION

Website and Online Payment Systems. In addition to the information that you provide to us, we may also collect information about you during your visit to our Website and Online Payment Systems. We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your internet address (IP Address), the pages you have viewed, and the actions you have taken while using the Website and Online Payment Systems. Some of the tools we use to automatically collect information about you may include:

- (a) Cookies. A “cookie” is a small data file transmitted from a website to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use either (or both) of them:

(1) session cookies, which do not stay on your device after you close your browser, and

(2) persistent cookies, which remain on your device until you delete them or they expire. We

may use the following categories of cookies on our Website and Online Payment Systems.

- i. **Strictly Necessary Cookies.** These cookies are essential in order to enable you to move around the Website and Online Payment Systems and use its features. Without these cookies, services you have requested, such as maintaining a record of your application for our services, cannot be provided.
- ii. **Performance Cookies.** These cookies collect anonymous information on how you use our Website and Online Payment Systems to help us understand how you arrive at our Website and Online Payment Systems, browse or use our Website and Online Payment Systems and highlight areas where we can improve, such as navigation. The data stored by these cookies

never shows personal details from which your individual identity can be established.

- iii. **Functionality Cookies.** These cookies remember choices you make such as the country from which you visit our Website and Online Payment Systems, your preferred language, and your search parameters. This information can then be used to provide you with an experience more appropriate to your selections and to make your visits to our Website and Online Payment Systems more tailored to your preferences. The information in these cookies may be anonymized. These cookies cannot track your browsing activity on other websites.
- iv. **Targeting Cookies or Advertising Cookies.** These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third-party advertising networks. These cookies remember the websites you visit and that information is disclosed with other parties, such as advertisers.

Of course, if you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser's settings. However, by disabling cookies on your device, you may be prohibited from full use of the Website and Online Payment Systems' features or lose access to some functionality.

- (a) Google Analytics. Google Analytics mainly uses first-party cookies to report on your interactions with our Website and Online Payment Systems. You may disable cookies or delete any individual cookie. To learn more about Google's privacy practices, please review the [Google Privacy Policy](#) and see how Google uses information collected from its partner websites (located at www.google.com/policies/privacy/partners/). You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>. Note that this add-on only disables Google Analytics measurement and lasts only as long as you use the browser on which you installed the plugin and do not delete the opt-out cookie. Where websites have implemented Google Analytics with other Google Advertising products, like Google Ads, additional advertising identifiers may be collected. Users can opt-out of this feature and manage their settings for this cookie using the Ads Settings. [Learn more.](#) Google Analytics also collects Internet Protocol (IP) addresses to provide and protect the security of the Google services, and to give us a sense of which country, state, or city in the world our users come from (also known as "IP geolocation"). Google Analytics provides a method to mask IPs that are collected but note that we have access to our website users' IP addresses even if we do not use Google Analytics.

(b) Meta Pixel. With the help of the Meta pixel, also known as the Facebook Pixel, Meta is able to determine the visitors of our Website and Online Payment Systems as a target group for the presentation of advertisements. With the help of the Meta pixel, we want to make sure that our ads are in line with the potential interest of users and do not have a nuisance effect. Using the Meta pixel, we can also track the effectiveness of Meta or Facebook ads for statistical and market research purposes. Meta's processing of the data is governed by Meta's Data Usage Policy, which is available at <https://www.facebook.com/policy.php>. For specific information and details about the Meta pixel and how it works, please visit the Meta Business Help Center: <https://www.facebook.com/business/help/651294705016616>.

(c) Hotjar. We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' behavior and experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar will set a cookie when you use our website and Hotjar may use other technologies to collect data on our users' behavior and their devices. This collected information includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our Website and Online Payment Systems. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. For further details, please see Hotjar's privacy policy (<https://www.hotjar.com/legal/policies/privacy/>) and the 'about Hotjar' section of [Hotjar's support site](#). To opt-out of any tracking by Hotjar, please visit <https://www.hotjar.com/policies/do-not-track/> and follow the instructions at that page.

(d) Web Beacons. A Web Beacon is an electronic image. Web Beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your behavior. If you choose to receive emails from us, we may use Web Beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. Some of the third-party marketers we engage with may use Web Beacons to track your interaction with online advertising banners on our Website and Online Payment Systems. This information is only collected in aggregate form and will not be linked to your Personal Information. Please note that any image file on a webpage can act as a Web Beacon.

(e) Embedded Web Links. Links provided in our emails and, in some cases, on third-party websites may include tracking technology embedded in the link. The tracking is accomplished through a redirection system. The redirection system allows us to understand how the link is being used by email recipients. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the Personal Information that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.

(f) Third-party Websites and Services. We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the marketing campaigns we are contracting them to provide. The information collected can be gathered on our Website and Online Payment Systems and also on the websites where our marketing communications are appearing. For example, we may collect data where our banner advertisements are displayed on third-party websites.

Applications. In addition to the information that you provide to us, we may also collect information about you during your visit to our Applications. We collect this information using automated technology. This technology may collect information about your behavior and your device, such as your internet address (IP Address), the pages you have viewed, the actions you have taken while using the Applications, saved preferences, and log-in Session ID. This information is not personally identifiable or capable of being used to identify you in the scope of this Policy. You can manage how your mobile device and mobile browser disclose location information with us, as well as how your mobile browser handles cookies and related technologies, by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

5. HOW WE USE YOUR INFORMATION

The information we gather and that you provide is collected to provide you information and the services you request, in addition to various other purposes, including, but not limited to:

- providing the information, products and services you request;
- security, credit or fraud prevention purposes, including any criminal background checks of certain applicants;
- providing you with effective customer service, including monitoring, managing and updating your machines and products;
- providing you with a personalized experience when you use the Platform;
- warranty and financing services;
- developing new products and services;
- contacting you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- contacting you with information and notices related to your use of the Platform;
- inviting you to participate in surveys and providing feedback to us (in accordance with any privacy preferences you have expressed to us);
- better understanding your needs and interests;
- improving the content, functionality and usability of the Platform;
- improving our products and services;
- improving our marketing and promotional efforts; and
- any other purpose identified at the point of data collection, in an applicable privacy notice, in a click-through agreement or in any other agreement between you and us.

Duration. The length of time Company intends to retain Personal Information, including sensitive information, if any, is for as long as reasonably necessary to carry out Company's intended business purpose for such information.

6. HOW WE DISCLOSE YOUR INFORMATION

We may disclose your Personal Information to a third party for a business purpose, including the following categories of third parties:

- *Our Affiliates.* We may disclose the information collected through the Platform with our Affiliates in order to provide our products, services and effective customer support.
- *Third-party Service Providers.* We disclose Personal Information and Raw Data collected through the Platform with third-party Service Providers who act for or on behalf of the Company. These third parties may need information about you to perform their functions. "Service Providers" may include suppliers, dealers, distributors, companies and consultants that provide website hosting, software development, payment processing, website and data analytics, order fulfillment, information technology, applicant background checks, and related infrastructure support, customer service, email delivery, and auditing.
- *With Other Carefully Selected Business Partners.* From time to time, we may disclose your Personal Information and Raw Data with selected third parties (other than our service providers). For example, we partner with third parties to offer sustainability initiatives where a grower's Raw Data is provided to such third parties to calculate carbon credits and a portion of those carbon credits are paid to the grower. Additionally, we may partner with third parties to sponsor contests or other promotions, and we may disclose with these third parties the Personal Information you submit to us to participate in the contest or take advantage of the promotion. Before doing so, however, we may offer you the opportunity to "opt out" or "opt in" as required by applicable law.
- *Third-Parties for Credit Application Processing.* If you submit a credit application with the Company, we may collect your information from, or disclose your information to, certain third parties, such as your financial institutions, industry trade groups, credit bureaus and credit sharing groups. The Company collects or discloses this information in order to adequately investigate and processes the applicant's application.
- *In Aggregate or De-Identified Form.* We may also disclose information and data about you that is not personally identifiable, such as pooled agronomic field data. We may also publish reports and otherwise process, sell, license and distribute data that contains aggregated and statistical data about our customers and equipment (including de-identified Raw Data), provided that these reports and data sets do not contain information that would enable the recipient to identify you.

Except as described in this Policy, we will not disclose your information with third parties without your notice and consent, unless it is under one of the following circumstances:

- *Legal Reasons.*

- We believe that disclosure is reasonably necessary to comply with any applicable law, regulation, subpoena, or court order;
- To respond to duly authorized information requests from law enforcement or other governmental authorities;
- To enforce our agreements or policies;
- To investigate and prevent security threats, fraud, or other malicious activity; or
- To respond to an emergency that we believe in good faith requires us to disclose such information to assist in preventing the death or serious bodily injury of any person or Company employee.

Sale of Business or Merger. There are circumstances where the Company may decide to buy, sell, or reorganize its business. Under these circumstances, it may be necessary to disclose or receive Personal Information with prospective or actual purchasers, acquisition targets, partners or affiliates. In such circumstances, the Company will ensure your information is used in accordance with this Policy.

7. YOUR CHOICES AND SELECTING YOUR PRIVACY PREFERENCES

We want to provide you with relevant information that you have requested. When possible, we will always provide options as to what information we collect and how you can manage any preferences that pertains to such information.

If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Transactional or service-oriented messages, such as delivery confirmation messages, are usually excluded from such preferences, as such messages are required to respond to your requests or to provide goods and services, and are not intended for the purposes of marketing.

From time to time, we may send you email newsletters and marketing emails. You may opt out of them at any time by selecting the “unsubscribe” link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided. Even if you opt-out of receiving marketing material, we may still need to contact you with important information about your account or your equipment. For example, even if you opt-out of marketing emails, we will still send you a confirmation when you purchase something from our Platform, as well as product safety communications.

8. TEXT MESSAGING

You may have the opportunity to receive SMS or "text" messages, pre-recorded voice messages or auto-dialed phone calls from the Company, its affiliates and related entities as well as third parties. Such messaging may be used to authenticate your identity or mobile device, as well as provide you informational updates about services or products you may have requested. In providing your mobile device number or cell phone number to the Company, you knowingly consent to such communications from the Company or for the Company to use your cell phone number or mobile device number. In providing your number, you represent that you have the

authority to agree to receive text messages at the telephone number that you provide to the Company, or from which you sent the text message request to us. You further acknowledge that: (a) no purchase is required to opt into this service; (b) you may opt out at any time by following the instructions provided in our communications to you; and (c) your receipt of text messages may result in separate charges from your mobile provider.

Any such communications you receive from us will be administered in accordance with your preferences and this Policy.

9. ACCURACY AND ACCESS TO YOUR PERSONAL INFORMATION

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing.

Where we can provide you access to your Personal Information in our possession, we will always ask you for a username and password to help protect your privacy and security. We recommend that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.

To view and change the Personal Information that you have provided to us, you can log in to your account and follow the instructions on that webpage, or contact us directly for assistance.

10. INFORMATION OF MINORS

We do not knowingly collect or use information from individuals under the age of thirteen (13) without parental or guardian consent. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any Personal Information that we have collected about minors under the age of 13 without parental or guardian consent, we will take steps to securely remove it from our systems.

11. FEEDBACK

We welcome inquiries or feedback on the services or products you might use or like to use. Any inquiries, feedback, suggestions, or ideas, you provide to us (collectively, “Feedback”) will be treated as non-proprietary and non-confidential. Your Feedback on or through the Platform may be available to others who visit the Platform. In addition, we may use your Feedback in advertising campaigns and other promotions. We may or may not use your name in connection with such use, and we may or may not seek your consent before using the Feedback for such purposes. Therefore, you should have no expectation of privacy with respect to your Feedback on or through the Platform. You should not submit any content you do not wish to make available to the general public. Your Feedback must not violate the privacy or other rights of others. You may not use false identifying information or contact information, impersonate any person or entity, or otherwise mislead us as to the origin of any Feedback.

12. THIRD-PARTY WEBSITES

This Policy does not apply to websites or other domains that are maintained or operated by third parties or our affiliates. Our Platform may link to third-party websites and services. For example, if you click on an advertisement on the Platform, you may be taken to another website that we do not control. These links are not endorsements of these websites, and this Policy does not extend to them. Because this Policy is not enforced on these third-party websites, we encourage you to read any posted privacy policy of the third-party website before using the service or website and providing any information.

13. YOUR RIGHTS UNDER STATE LAW

Selling or Sharing of Personal Information. We may share limited information to create, deliver, and measure advertisements for things you might like. This may include targeted advertising, which may be based on Personal Information obtained from your interactions with the Platform or other businesses. We also disclose Personal Information in ways that may be considered a sale of information under some state laws. Subject to applicable state laws, you may have the right to opt-out of such use of your Personal Information. If you would like to opt-out, just:

- Submit a request via our [Your Privacy Choices](#) page.
- Submit a request via email at privacypolicy@helenaagri.com; or
- Call us at 866.267.8684 if you are a California resident.

We recognize and honor the preference signal associated with a [Global Privacy Control](#).

California. If you are a California consumer, as that term is defined under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act, you may have additional rights to your Personal Information. For more information regarding these rights, please review our [California Privacy Disclosure](#).

Nebraska and Texas. The Nebraska Data Privacy Act and Texas Data Privacy and Security Act applies to Nebraska and Texas consumers, respectively. As a Nebraska or Texas resident, you may have the following rights with respect to your personal information provided to us, subject to our verification of your identity:

- Right to know whether we process your personal data and to obtain the personal data in a readable format;
- Right to correct inaccuracies in your personal data, taking into account the nature of the data and the purposes for processing the data;
- Right to delete personal data provided by or obtained about you;
- Right to opt out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or profiling.
- Right to not face retaliation or discrimination for exercising these rights.

If you are a Nebraska or Texas resident who chooses to exercise the rights listed above, you can submit a request via email at privacypolicy@helenaagri.com.

14. LOCATION OF OUR PLATFORM AND SERVICES

We do not warrant or represent that this Policy or the Platform's use of your Personal Information complies with the laws of every jurisdiction. Furthermore, to provide you with our services, we

may store, process, and transmit information in the United States and other locations around the world, including countries that may not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy.

15. SAFEGUARDING THE INFORMATION WE COLLECT

We use reasonable technical, administrative, and physical safeguards in order to protect your Personal Information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as well, to safeguard your information through the proper use and security of any online credentials used to access your Personal Information, such as a username and password. If you believe your credentials have been compromised, please change your password. Please also notify us immediately of any actual or suspected unauthorized use of the Platform or your information.

16. FEDERAL CROP INSURANCE; NONDISCRIMINATION STATEMENT; FCRA

For transactions subject to the Federal Crop Insurance Act (7 U.S.C. 1501- 1524), please be advised of the following: **COLLECTION OF INFORMATION AND DATA (PRIVACY ACT) STATEMENT, Agents, Loss Adjusters and Policyholders.** The following statements are made in accordance with the Privacy Act of 1974 (5 U.S.C. 552a): The Risk Management Agency (RMA) is authorized by the Federal Crop Insurance Act (7 U.S.C. 1501- 1524) or other Acts, and the regulations promulgated thereunder, to solicit the information requested on documents established by RMA or by approved insurance providers (AIPs) that have been approved by the Federal Crop Insurance Corporation (FCIC) to deliver Federal crop insurance. The information is necessary for AIPs and RMA to operate the Federal crop insurance program, determine program eligibility, conduct statistical analysis, and ensure program integrity. Information provided herein may be furnished to other Federal, State, or local agencies, as required or permitted by law, law enforcement agencies, courts or adjudicative bodies, foreign agencies, magistrate, administrative tribunal, AIP's contractors and cooperators, Comprehensive Information Management System (CIMS), congressional offices, or entities under contract with RMA. For insurance agents, certain information may also be disclosed to the public to assist interested individuals in locating agents in a particular area. Disclosure of the 2 information requested is voluntary. However, failure to correctly report the requested information may result in the rejection of this document by the AIP or RMA in accordance with the Standard Reinsurance Agreement between the AIP and FCIC, Federal regulations, or RMA-approved procedures and the denial of program eligibility or benefits derived therefrom. Also, failure to provide true and correct information may result in civil suit or criminal prosecution and the assessment of penalties or pursuit of other remedies.

NONDISCRIMINATION STATEMENT. The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or a part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotope, etc.) should contact USDA's TARGET Center at (202) 720- 2600 (voice and TDD). To file a complaint of discrimination, write to: USDA, Director, Office

of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 202509410, or call (800) 795-3272 (voice) or (202) 720- 6382 (TDD).

Fair Credit Reporting Act (“FCRA”). If you apply for a product or service, we may collect information from your consumer reports, such as your credit report. You may have a right to request the source of the credit report. While the Company may use your information to request a consumer report on your behalf and only subject to your written consent, the Company is not a “consumer reporting agency” or “reseller” as those terms are defined under the FCRA. The Company does not process, assemble, or merge any personal information to create or modify any consumer report. Accordingly, the FCRA does not apply to the Company’s processing of personal information as described in this Policy.

17. CHANGES TO THIS POLICY

This Policy describes our current policies and practices with regard to the information we collect through the Platform. We are continually improving and adding to the features and functionality of the Platform along with the products and services we offer through the Platform. If we make any changes to this Policy, a revised Policy will be posted on this webpage and the date of the change will be reported in the “Last Revised” block above. You can get to this page from any of our webpages by clicking on the “Privacy Policy” link (usually at the bottom of the screen).

18. HOW TO CONTACT US

We value your opinions and welcome your feedback. To contact us about this Policy or your Personal Information, please contact us by email at privacypolicy@helenaagri.com or by mail at:

Helena Agri-Enterprises, LLC
225 Schilling Blvd., Ste. 300
Collierville, TN 38017
Attn: Privacy Policy/Legal Dept.